

Presentment Date: February 8, 2018 at Noon
Objection Deadline: February 8, 2018 at 11:00 a.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

CHOWAIKI & Co. FINE ART LTD.,
Debtor.

Chapter 7 Case No. 17-13228(MKV)

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**RESPONSE OF SECURED CREDITOR, JANE HOLZER TO CHAPTER 7 TRUSTEE'S
MOTION FOR AN ORDER ESTABLISHING A SPECIAL BAR DATE FOR FILING
OWNERSHIP CLAIMS**

Jane Holzer, by her attorneys, Teitelbaum Law Group, LLC, for her response to the Chapter 7 Trustee's motion for an order establishing a special bar date for the filing of ownership claims, respectfully states:

1. Jane Holzer ("**Holzer**") filed a proof of claim in this case as Claim No. 2 on January 10, 2018 asserting a claim in the principal amount of \$1,185,041.00, secured by among other things certain works of art.
2. Holzer does not object to the Trustee's motion; however, the filing and resolution of such ownership claims with respect to pieces of art may implicate the rights creditors granted a security interest therein by the Debtor.
3. As such, in connection with the filing and resolution of any ownership claims, Holzer requests that the Trustee also implement procedures to (i) provide specific notice to secured creditors asserting an interest in art regarding the filing of an ownership claim with respect to such art; (ii) provide specific notice to the secured creditor asserting an interest in art regarding any hearings or proceedings concerning the resolution of such ownership claims; and (iii) permit secured creditors asserting a security interest in such art to intervene as of right in such proceedings to object to any such ownership interest and/or assert the priority of their claim as against any putative owner.

Dated: January 29, 2018

TEITELBAUM LAW GROUP, LLC
Attorneys for Jane Holzer

By: /s/ Jay Teitelbaum
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